

Beth E. Terrell, WSBA #26759
Erika L. Nusser, WSBA #40854
Attorneys for Plaintiffs
TERRELL MARSHALL DAUDT
& WILLIE PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603
Facsimile: (206) 350-3528
Email: bterrell@tmdwlaw.com
Email: enusser@tmdwlaw.com

[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANELLE BLANGERES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNITED STATES SEAMLESS, INC.,
and KAYCAN LIMITED,

Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
*PRO HAC VICE***

Jonas P. Mann (the “Applicant”) hereby moves the Court to enter an order
permitting him to participate in this case *Pro Hac Vice* as counsel for Plaintiffs
Robert and Danelle Blangeres (“Plaintiffs”), pursuant to Local Rule 83.2(c). In
support of this Motion, the Applicant states as follows:

1 1. The Applicant is an associate in the law firm of Audet & Partners,
2 LLP, in San Francisco, California.

3 2. The Applicant is a member in good standing of the bars several
4 Federal District Courts and the highest courts in California, Pennsylvania, and
5 New Jersey.
6

7 3. The Applicant does not reside in the State of Washington and does
8 not maintain an office in the State of Washington.
9

10 4. The Applicant responds to the information requested in Local Rule
11 83.2(c)(2) as follows:
12

13 (a) The Applicant's address and telephone number are 221 Main
14 Street, Suite 1460, San Francisco, California, 94105; telephone (415) 568-2555;
15 facsimile (415) 568-2556; email: jmann@audetlaw.com.
16

17 (b) The dates of admission to practice before other courts are
18 listed below:
19

<u>State Bar Admissions</u>	<u>Date Admitted</u>
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Pennsylvania	10/15/2007
New Jersey	11/30/2007
California	06/02/2009

<u>Federal Bar Admissions</u>	<u>Date Admitted</u>
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N.D. California	06/02/2009
C.D. California	06/02/2009

1 S.D. California
2 E.D. California

06/02/2009
03/24/2011

3 (c) The name, address and telephone number of admitted counsel
4 with whom the Applicant will be associated are: Beth E. Terrell and Erika L.
5 Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite
6 300, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206)
7 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.
8

9 (d) The Applicant's appearance is necessary because Plaintiffs in
10 this action have retained him in this action.
11

12 (e) There are no disciplinary sanction actions pending against the
13 Applicant and the Applicant has never been subject to any disciplinary sanctions
14 by any court or Bar Association.
15

16 5. The Applicant understands that if he is admitted *Pro Hac Vice* he
17 will be subject to the disciplinary jurisdiction of this Court.
18


19 6. The Applicant is familiar with the facts, issues and documents
20 associated with this case.
21

22 7. The Applicant is familiar with the local rules of this Court.

23 WHEREFORE, Jonas Mann respectfully requests that the Court enter an
24 order in the form proposed granting the admission *Pro Hac Vice* of Jonas Mann
25 during the pendency of this case.
26

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3
4 Dated: 3/25/2014


Jonas P. Mann, Applicant

STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that Erika L. Nusser and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Michael McShane is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 25th day of March, 2014.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759
Beth E. Terrell, WSBA #26759
Erika L. Nusser, WSBA #40854
Attorneys for Plaintiffs
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Seattle, Washington 98103
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Facsimile: (206) 350-3528
Email: bterrell@tmdwlaw.com
Email: enusser@tmdwlaw.com

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on March 25, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Gregory J. Arpin, WSBA #2746
Attorneys for Defendant United States Seamless, Inc.
PAINE HAMBLLEN LLP
717 W. Sprague Avenue Suite 1200
Spokane, Washington 99201-3505
Telephone: (509) 455-6000
Fax: (509) 838-0007
Email: greg.arpin@painehamblen.com

Jon R. Brakke, *Admitted Pro Hac Vice*
Attorneys for Defendant United States Seamless, Inc.
VOGEL LAW FIRM
218 NP Avenue
P.O. Box 1389
Fargo, North Dakota 58107-1389
Telephone: (701) 237-6983
Facsimile: (701) 476-7676
Email: jbrakke@vogellaw.com

Patrick M. Paulich, WSBA #10951
H. Matthew Munson, WSBA #32019
Attorneys for Defendant Kaycan Limited
THORSRUD CANE & PAULICH
1300 Puget Sound Plaza
1325 Fourth Avenue
Seattle, Washington 98101
Telephone: (206) 386-7755
Facsimile: (206) 386-7795
Email: ppaulich@tcplaw.com
Email: mmunson@tcplaw.com

1 DATED this 25th day of March, 2014.

2
3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

5 By: /s/ Beth E. Terrell, WSBA #26759

6 Beth E. Terrell, WSBA #26759

7 Attorneys for the Plaintiff

8 936 North 34th Street, Suite 300

9 Seattle, Washington 98103-8869

10 Telephone: (206) 816-6603

11 Facsimile: (206) 350-3528

12 Email: bterrell@tmdwlaw.com

13
14 *Attorneys for Plaintiff*